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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

THE UNITED STATES OF AMERICA, ex  
rel. MICHAEL T. BROOKS,

Relator,

v.

TRILLIUM COMMUNITY HEALTH  
PLAN, INC., AGATE RESOURCES, INC.,  
and LANE INDIVIDUAL PRACTICE  
ASSOCIATION, INC.,

Defendants.

Case No.: 6:14-cv-01424-MC

**DECLARATION OF REILLEY D.  
KEATING IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
ORDER TO SHOW CAUSE WHY  
RELATOR SHOULD NOT BE  
ADJUDGED IN CIVIL CONTEMPT**

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I, Reilley D. Keating, declare as follows:

1. I am one of the counsel of record for Trillium Community Health Plan, Inc., Agate Resources, Inc., and Lane Individual Practice Association, Inc., in the above-captioned proceeding. I make this declaration in support of Defendants' Motion for Order to Show Cause

Why Relator Should Not Be Adjudged in Civil Contempt. I have personal knowledge of the facts stated in this declaration.

2. Attached hereto as Exhibit 1 is a true and correct copy, with pertinent portions highlighted, of email correspondence between myself and Relator Michael T. Brooks on August 6, 2021.

3. Attached hereto as Exhibit 2 is a true and correct copy, with pertinent portions highlighted, of an email that Mr. Brooks sent me on August 9, 2021.

I hereby declare under penalty of perjury that the foregoing is true and correct.

DATED: August 10, 2021.

/s/ Reilley D. Keating  
Reilley D. Keating

**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **DECLARATION OF REILLEY D. KEATING IN SUPPORT OF DEFENDANTS' MOTION FOR ORDER TO SHOW CAUSE WHY RELATOR SHOULD NOT BE ADJUDGED IN CONTEMPT** on the following named person(s) on the date indicated below by:

- ☒ mailing with postage prepaid
- ☐ overnight delivery
- ☒ email
- ☐ notice of electronic filing using the CM/ECF system

to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s) at his or her last-known address(es) indicated below.

Michael T. Brooks  
32713 Vintage Way  
Coburg, OR 97408  
Tel: 541-556-6130  
Email: [mibrooks@mac.com](mailto:mibrooks@mac.com)

*Plaintiff Pro Se*

DATED: August 10, 2021.

STOEL RIVES LLP

/s/ Reilley D. Keating

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